## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

PIERRE BRAZEAU, Individually and on Behalf of All Others Similarly Situated,

Case No. 1:21-cv-00751-RP

Plaintiff,

**CLASS ACTION** 

v.

CASSAVA SCIENCES, INC., REMI BARBIER, ERIC J. SCHOEN, JAMES W. KUPIEC, NADAV FRIEDMANN, and MICHAEL MARSMAN,

Defendants.

WANDA NEWELL, Individually and on Behalf of All Others Similarly Situated,

Case No. 1:21-cv-00760-RP

Plaintiff,

**CLASS ACTION** 

v.

CASSAVA SCIENCES, INC., REMI BARBIER, and ERIC J. SCHOEN,

Defendants.

KATLYN K. REIN, Individually and on Behalf of All Others Similarly Situated,

Case No. 1:21-cv-00856-RP

Plaintiff,

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v.

CASSAVA SCIENCES, INC., REMI BARBIER, ERIC J. SCHOEN, JAMES W. KUPIEC, NADAV FRIEDMANN, and MICHAEL MARSMAN,

Defendants.

**CLASS ACTION** 

NOTICE OF THIBAULT MAGNIN
CONCERNING NON-OPPOSITION TO COMPETING LEAD PLAINTIFF MOTIONS

Lead Plaintiff Movant Thibault Magnin ("Magnin") respectfully submits this notice with

respect to the pending motions for appointment of Lead Plaintiff, approval of selection of counsel,

and consolidation. On October 26, 2021, Magnin filed a motion to be appointed Lead Plaintiff, to

have his counsel appointed as Lead Counsel, and for consolidation of the above-captioned actions.

ECF No. 24.

The PSLRA provides a presumption that the "most adequate plaintiff" to represent the

interests of class members is the person or group that, among other things, has "the largest financial

interest in the relief sought by the class." 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I). Having reviewed the

competing Lead Plaintiff motions and supporting papers provided by the other movants seeking

appointment as Lead Plaintiff, it appears that Magnin does not have the "largest financial interest."

However, in the event that the Court determines that other movants are incapable or inadequate to

represent the class in this litigation, Magnin remains ready, willing and able to serve as Lead

Plaintiff and/or as a named class representative.

Mr. Magnin reserves any and all rights to share in any recovery in this action.

Dated: November 8, 2021

Respectfully submitted,

GEORGE BROTHERS KINCAID & HORTON,

L.L.P.

/s/ B. Russell Horton

B. Russell Horton

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Liaison Counsel for Proposed Lead Plaintiff

Thibault Magnin

1

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Counsel for Proposed Lead Plaintiff Thibault Magnin and Proposed Lead Counsel for the Class

## **CERTIFICATE OF SERVICE**

I certify that on November 8, 2021, a true and correct copy of the foregoing document was filed with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ B. Russell Horton
B. Russell Horton